



**SHAKESPEARE
THEATRE COMPANY**

January 5, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel,
Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Shakespeare Theatre Company, located in Washington, DC, that provides approximately 455 performances a year to 169,970 audience members and education programs to 23,344 students and that endeavors to be an important resource to an expanded national and international community—as the nation's premier destination for classic theatre, as a training ground for the next generation of theatre artists and as a model provider of high-quality educational content for students and scholars, I write with concern about protection for our wireless microphones and backstage communications devices.

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Shakespeare Theatre Company's wireless gear consists of microphones, wireless communication packs, assisted listening devices and wireless lighting control.

Michael Kahn Artistic Director Chris Jennings Managing Director Michael R. Klein Chairman

ADMINISTRATIVE OFFICES 516 EIGHTH STREET SE WASHINGTON, DC 20003-2834 T 202.547.3230 F 202.547.0226 ShakespeareTheatre.org



The microphones are AKG DMS 700 and are tunable between 510-680 MHz, which are digital and in the UHF band.

In our largest venue, Sidney Harman Hall on F Street, NW, our wireless communication packs are HME Pro850, which is tunable between 510-680 MHz. At our other venue, the Lansburgh Theatre, we have HME 800 packs which are not tunable. These packs are analog and in the UHF band.

The assisted listening devices we use to make our performances accessible to the hearing impaired are the Listen LT Series, which are also tunable between 72-75.950 MHz in the VHF band.

Our wireless lighting controls are RC4 Wireless Dimming 2.0 units and are tunable to 3 channels in the 907.45-921.10 MHz range in the UHF band.

All of our equipment is within the TV band range, and we use wireless devices in every production in our theatres. There are at least 8 wireless communication packs, between 2-20 microphones in use per show and 1-2 wireless lighting control packs per show. The assisted listening devices are used at every show by audience members.

We own all the equipment mentioned above and in some instances rent additional equipment to supplement. In most cases, the reasonable life expectancy of this equipment would be in excess of 10 years.

The wireless microphones were purchased at a time it was already known that a move out of the 700 MHz band would be necessary and units were bought that would fall outside that range. The rest of our equipment already fell outside the range, so there was no impact.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,

A handwritten signature in black ink, which appears to read 'Chris Jennings'. The signature is fluid and cursive, with a large, stylized 'C' at the beginning.

Michael Kahn Artistic Director

Chris Jennings Managing Director

Michael R. Klein Chairman